

EXHIBIT A

Index of Documents Sought by Rich

Rich v. Simoni v. LP, No. 1:12-cv-12-IMK-JSK

Index of Documents Sought by Rich

Page range	Document	Privilege or designation	Status
A. Documents from underlying Spelter litigation (2003-09).			
LP00001-LP00003	Email from Medina to Givens, Taylor, Moore, Shaffer, Bailey, Proctor, Toolan, Rich dated 12/12/2003 subject: Confidential/Spelter West Virginia	Attorney work product.	At issue.
LP000210-LP000211	E-mail from Medina to Blanchard, Thomas, Proctor, Logan, Rafferty, Toolan dated 12/15/2003; Subject: Cost Committee	Attorney work product; confidential.	At issue.
LP000249	E-mail from Buchanan to Blanchard dated 4/26/2012, Subject: 4258 Spelter: Perrine, et al v. E.I. Dupont De Nemours and Co., et al: SIMONI	Attorney work product; attorney client privilege; joint defense privilege.	At issue.
LP000254	E-mail from Buchanan to Blanchard dated 4/26/2012, Subject: 4258 Spelter: Perrine, et al v. E.I. Dupont De Nemours and Co., et al: SIMONI	Attorney work product; attorney client privilege; joint defense privilege.	At issue.
LP000802	E-mail from Carol Moore to Mason, McWilliams, Buchanan, Taylor dated 10/6/2006, Subject: Dummond witnesses- briefs of friends and family	Attorney work product.	At issue.
LP000831	E-mail from Medina to Buchanan, Blanchard, Env Group dated 12/11/06, re: Spelter/Simoni call	Attorney work product.	At issue.
LP000832	E-mail from Buchanan to Medina, Blanchard, Environmental Group dated 12/11/06 re: Spelter/Simoni call	Attorney work product.	At issue.
LP000837-LP000838	E-mail from-Moore to Buchanan, Taylor, Mason, Env Group, Madonna, Rich, Jones, Campbell, Laraw, Proctor dated 12/28/2006, Subject: Perrine/Drummond Conference Call Agenda	Attorney work product; contains mental impressions of counsel.	Produced by Rich at RICH-001769.
LP000839-LP000841	E-mail from Buchanan to Moore, Taylor, Mason, Env Group, Madonna, Rich, Jones, Campbell, Laraw, Proctor dated 12/28/2006 Subject: Perrine/Drummond Conference Call Agenda	Attorney work product; contains mental impressions of counsel.	Produced by Rich at RICH-001769.
LP000842-LP000844	E-mail from Medina to Buchanan, Moore, Taylor, Mason, Env Group, Madonna, Rich, Jones, Campbell, Laraw, dated 12/28/2006 Subject: Proctor-Perrine/Drummond Conference Call Agenda	Attorney work product; contains mental impressions of counsel.	Produced by Rich at RICH-001769.
LP000845-LP000847	E-mail dated 12/28/2006-Medina to Buchanan, Moore, Taylor, Mason, Env Group, Campbell, Laraw, Jones, Rich, Madonna-Draft of Perrine/Drummond Conference Call Agenda	Attorney work product; contains mental impressions of counsel.	Produced by Rich at RICH-001769.
LP000848	E-mail from Medina to Environment Grp dated 12/29/2006, Subject:Spelter/Simoni	Attorney work product.	At issue.
LP000849-LP000850	E-mail from Mackenzie Fosselman to Medina, Buchanan, Env Group dated 12/29/2006, Subject:Spelter/Simoni	Attorney work product.	At issue.
LP000851-LP000852	E-mail from Mackenzie Fosselman to Medina, Buchanan, Env Group dated 12/29/2006, Subject: Spelter/Simoni	Attorney work product.	At issue.
LP000853-LP000854	E-mail from Medina to Environmental Group dated 12/29/2006 re: Drummond - SOL - docs and Simoni docs	Attorney work product.	At issue.

Page range	Document	Privilege or designation	Status
LP000856-LP000860	E-mail from Moore to trial team dated 7/18/07 re: Perrine v. Dupont- "To Do" list updated - July 18, 2007	Attorney work product.	Produced by Rich at RICH-001776.
LP000861	E-mail from Medina to trial team dated 2/8/07 re: Spelter/Werntz and Simoni WVU FOIA Requests	Attorney work product.	Produced by Rich at RICH-001977.
LP000863	E-mail from Buchanan to trial team dated 2/8/07 re: Spelter/Werntz and Simoni WVU FOIA Requests	Attorney work product.	Produced by Rich at RICH-001977.
LP000865	E-mail from Medina to trial team dated 2/8/07 re: Spelter/Werntz and Simoni WVU FOIA Requests	Attorney work product.	Produced by Rich at RICH-001977.
LP000867-LP000868	E-mail from Buchanan to trial team dated 2/8/07 re: Spelter/Werntz and Simoni WVU FOIA Requests	Attorney work product.	Produced by Rich at RICH-001977.
LP000869-LP000870	E-mail from Medina to trial team dated 2/8/07 re: Spelter/Werntz and Simoni WVU FOIA Requests	Attorney work product.	Produced by Rich at RICH-001977.
LP000871-LP000872	E-mail from Medina to trial team dated 2/8/07 re: Spelter/Werntz and Simoni WVU FOIA Requests	Attorney work product.	Produced by Rich at RICH-001977.
LP000874-LP000875	E-mail from Buchanan to trial team dated 2/8/07 re: Spelter/Werntz and Simoni WVU FOIA Requests	Attorney work product.	Produced by Rich at RICH-001977.
LP000877-LP000879	E-mail from Medina to trial team dated 2/8/07 re: Spelter/Werntz and Simoni WVU FOIA Requests	Attorney work product.	Produced by Rich at RICH-001977.
LP000886-LP000888	E-mail from Medina to Givens, Taylor, Moore, Shaffer, Bailey, Proctor, Toolan, Rich dated 12/12/03; Subject: RE: Confidential/Spelter, West Virginia	Attorney work product; confidential.	At issue.
LP000889	E-mail from Medina to Proctor, Toolan, Moore, Blanchard, Logan, Smith, Bailey dated 5/11/04, re: Spelter Report	Attorney work product; confidential.	At issue.
LP000901-LP000902	E-mail from Medina to trial team dated 10/23/04 re: phone call	Attorney work product.	Produced by Rich at RICH-001743.
LP000903	E-mail from Medina to trial team dated 8/24/04 re: Class Action Complaint	Attorney work product.	At issue.
LP001498-LP001526	Notes of trial team meetings	Attorney work product; relates to other litigation.	At issue.
LP001577-LP001578	Internal attorney notes regarding tasks to be performed in support of litigation	Attorney work product.	At issue.
LP001581-LP001607	Internal attorney e-mails regarding tasks to be performed in support of litigation; impressions of counsel as to meaning of documents received	Attorney work product; irrelevant mental impressions of counsel.	At issue.
LP002433-LP002435	Perrine\SOL\RE ConfidentialSpelter West Virginia.pdf	Attorney work product and confidential. Portions redacted relate to impressions of potential litigation and also minor references to other cases.	At issue.
LP002438-LP002439	Perrine\SOL\Spelter Report.pdf	Attorney work product and confidential. Contains statements of intention in proceeding with case and evaluations of case.	At issue.

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B. Drafts of documents evidencing Levin Papantonio's expenses during the underlying Spelter litigation.			
LP002697-LP002703	Spelter\Spelter by Group 12.10.2010 POST TRIAL.xls	Attorney work product and confidential. This document contains information on costs at a detailed level. What those costs were spent on is privileged. No payments to Simoni were present on this list. The native format version of this document has been altered prior to production by typing an X over, and blacking out, all cost entries that had no relationship to this litigation. We have retained the original native format version which contains all of this information.	Believed to be produced by The Cochran Firm at CochranFirm020262-CochranFirm020383.
LP002704-LP002749	Spelter\Spelter by Group 12-09-10 4.00.xls	Attorney work product and confidential. This document contains information on costs at a detailed level. What those costs were spent on is privileged. The native format version of this document has been altered prior to production by typing an X over, and blacking out, all cost entries that had no relationship to this litigation. We have retained the original native format version which contains all of this information.	Believed to be produced by The Cochran Firm at CochranFirm020262-CochranFirm020383.
LP002750-LP002795	Spelter\Spelter by Group 12-9-10 with subtotals.xls	[Same as line above.]	Believed to be produced by The Cochran Firm at CochranFirm020262-383.
LP002796-LP002841	Spelter\Spelter by Group 12-9-10.xls	[Same as line above.]	Believed to be produced by The Cochran Firm at CochranFirm020262-383.
LP002842-LP002887	Spelter\Spelter by Group post trial 12.20.2010.xls	[Same as line above.]	Believed to be produced by The Cochran Firm at CochranFirm020262-383.
LP002890-LP002959	Spelter\Spelter Case Trans 12.07.2010.xls	[Same as line above.]	Believed to be produced by The Cochran Firm at CochranFirm005188-489.

Page range	Document	Privilege or designation	Status
LP002960-LP003029	Spelter\Spelter Case Trans 12.08.2010 details.xls	[Same as line above.]	Believed to be produced by The Cochran Firm at CochranFirm005188-489.
C. Documents generated in response to Simoni's demand letter (2010 documents).			
LP000220	E-mail from Moore to Phillips dated 3/30/10, re: FW: Perrine - Simoni	Attorney work product; joint defense privilege.	At issue.
LP000224	E-mail from Moore to Environmental Group dated 4/20/2010, subject: FW: Dr. Simoni	Attorney work product; joint defense privilege.	At issue.
LP001388	E-mail from Moore to Phillips re: Perrine - Simoni	Attorney work product; joint defense privilege.	At issue.
LP001399-LP001413	Research dated 3/29/2010	Attorney work product.	Levin Papantonio will voluntarily produce.
LP001463-LP001480	Research dated 3/29/2010	Attorney work product.	Levin Papantonio will voluntarily produce.
LP001527	E-mail from Moore to Environmental Group dated 4/20/10 re: Dr. Simoni	Attorney work product; joint defense privilege.	At issue.
LP001530	E-mail from Moore to Environmental Group dated 3/30/10 re: 4258 Spelter: Perrine, et al . . .	Attorney work product; joint defense privilege.	At issue.
LP001555-LP001572	Research dated 3/29/2010	Attorney work product.	Levin Papantonio will voluntarily produce.
LP001573-LP001574	E-mail from Phillips to Mills dated 3/30/10 re: Perrine - Simoni	Attorney work product; joint defense privilege.	At issue.